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[Additional counsel listed below]

Proposed Class Counsel

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KATHLEEN JORDAN, *et al.*, individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

ABSOLUTE DENTAL GROUP, LLC, and
JUDGE CONSULTING, INC.,

Defendants.

Case No. 2:25-cv-00986-JAD-DJA

**PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT WITH
DEFENDANT ABSOLUTE DENTAL
GROUP, LLC**

CLASS ACTION

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs,¹ individually and on behalf of all similarly situated persons, move the Court for preliminary approval of the proposed Class Action Settlement Agreement and Release ("Settlement Agreement" or "SA") with Defendant Absolute Dental Group, LLC ("Absolute Dental"), attached as **Exhibit 1**.

As set forth in the attached Memorandum in Support, the Court should find the proposed Settlement is within the range of reasonableness necessary to grant preliminary approval pursuant to Federal Rule of Civil Procedure 23(e) and enter the Preliminary Approval Order (SA, at Ex. C,

¹ All capitalized terms in this motion have the same definition ascribed to them in the Settlement Agreement. *See* SA, Section 1 (Definitions)

and separately submitted herewith): (i) granting preliminary approval of the Settlement; (ii) provisionally certifying the Settlement Class for settlement purposes; (iii) appointing the Plaintiffs as Class Representatives; (iv) appointing Andrew W. Ferich of Ahdoot & Wolfson, PC, Andrew E. Mize of Stranch, Jennings & Garvey PLLC, Jessica A. Wilkes of Federman & Sherwood, Mariya Weekes of Milberg LLC, and Nickolas J. Hagman of Cafferty Clobes Meriwether & Sprengel LLP as Class Counsel for the Settlement Class; (v) approving the form of the Notices and the Notice Program; (vi) approving the Claim Form and the claims process; (vii) appointing Epiq Class Action & Claims Solutions, Inc. as the Settlement Administrator; (viii) establishing the opt-out and objection procedures and deadlines; and (ix) scheduling a Final Approval Hearing at which time the Court will consider whether to grant Final Approval of the Settlement and the Application for Attorneys' Fee and Costs Award and Service Awards.

Dated: December 18, 2025

Respectfully submitted,

/s/

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Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 18, 2025, a true and correct copy of the above and foregoing was filed with the Clerk of Court via the Court's CM/ECF system for electronic service on all counsel of record.

Dated: December 18, 2025

/s/ Andrew W. Ferich

Andrew W. Ferich